

Document and Response to Comments Tracking Form
NV Energy – Reid Gardner Station
Administrative Order On Consent Implementation

Document Title Screened Interval Evaluation and Recommendations Memo

Preparer Stanley Consultants

Draft #1

To NDEP

From NV Energy

Submittal Date December 8, 2011

Comment Date March 21, 2012

Response Date June 18, 2012

Commenter Alison Oakley, CEM

Responder Mike Rojo

Comment #1

General Comment, NDEP notes that the conceptual site model (CSM) is under development for the Administrative Order on Consent (AOC) activities at RGS. In the interim, the proposed rationale for designating well zones as shallow, medium and deep is a logical approach; however, the approach should not drive data interpretations alone, but rather support evaluations while hydrostratigraphic unit designations and the CSM are being refined. Please include a discussion in the revised deliverable to address this general comment.

Response #1

Page 1 of the Screened Interval Evaluation and Recommendations Memo was revised to include the following language:

“In accordance with the AOC, NVE is currently developing a Conceptual Site-Wide Model (CSM). This monitoring well screening evaluation was conducted as part of the overall CSM development and the conclusions may be revised later as the CSM is finalized. In the interim, the monitoring well designation approach developed in this memo will be used.”

Comment #2

Page 3, paragraphs 1 and 2, following an example of the differences in groundwater quality identified between the screens of P-9 and P-9R, the report states: “In some cases, there is no current explanation for differences in groundwater quality between similar wells that are screened in the same aquifer zone. These wells require further investigation to evaluate whether there is a problem with the well integrity or well construction.” The conclusion that there may be a problem with the well’s integrity or construction may not be the only explanation. The differences between the wells may be related to site-specific hydrostratigraphy and not necessarily to the integrity or

construction of the well. Table 1 indicates that P-9 will be excluded from shallow contours. NDEP believes it may be premature to remove P-9 from the shallow contours. Please revise the deliverable to indicate that P-9 will be moved from “wells to exclude...” to “wells to watch...”.

Response #2

Both P-9 and P-9R will be sampled semi-annually and the parameter concentrations will be considered for contouring. Because the TDS results in these wells typically differ by an order of magnitude, NVE will evaluate which one to use in future contours.

The second paragraph on Page 3 of the Screened Interval Evaluation and Recommendations Memo was revised to state:

“In some cases, there is no current explanation for differences in groundwater quality between similar wells that are screened in the same aquifer zone. These wells require further investigation to evaluate whether site-specific hydrostratigraphy, well integrity, or well construction may be causing the groundwater quality differences.”

The bullet on page 4 related to P-9 was revised to state:

“Well P-9 should be further evaluated because the length of the water column within the screen is significantly smaller than the other wells in the area. “

The “Wells to exclude from shallow contours” column was removed from Table 2. P-9 was moved to the “Wells to watch/ need further evaluation” column in Table 2.

Final

To Mike Rojo

From Alison Oakley

Submittal Date June 18, 2012

Approval Date January 4, 2013

Approver 